

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT WINCHESTER

FREEMAN M. FROTHINGHAM, JR., AS )  
EXECUTOR OF THE ESTATE OF AND FOR )  
USE AND BENEFIT OF THE STATUTORY )  
BENEFICIARIES OF FREEMAN M. )  
FROTHINGHAM, SR., DECEASED )

PLAINTIFF, )

v. )

GGNSC WINCHESTER, LLC d/b/a Golden )  
Living Center-Mountain View; GPH )  
WINCHESTER, LLC; GGNSC EQUITY )  
HOLDINGS, LLC; GGNSC CLINICAL )  
SERVICES, LLC; GOLDEN GATE )  
NATIONAL SENIOR CARE, LLC; GGNSC )  
ADMINISTRATIVE SERVICES, LLC; )  
GOLDEN GATE ANCILLARY, LLC; GGNSC )  
HOLDINGS, LLC; AND 360 HEALTHCARE )  
STAFFING, LLC, )

DEFENDANTS. )

NO. 4:12-cv-00035  
JURY DEMANDED

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**STIPULATION AND AGREED ORDER OF DISMISSAL**

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Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure and Local Rule 68.1, the Plaintiff, Freeman M. Frothingham, Jr., as Executor of the Estate of and For Use and Benefit of the Statutory Beneficiaries of Freeman M. Frothingham, Sr., Deceased, and Defendants, GGNSC Winchester, LLC d/b/a Golden LivingCenter-Mountain View; GPH Winchester, LLC; GGNSC Equity Holdings, LLC; GGNSC Clinical Services, LLC; Golden Gate National Senior Care, LLC; GGNSC Administrative Services, LLC; Golden Gate Ancillary, LLC; GGNSC Holdings, LLC; and 360 Healthcare Staffing, LLC (“Defendants”), by and through counsel, announce to the Court that all matters here in controversy between them have been compromised and settled

out of Court, and that Plaintiff, for valuable consideration, has executed a Release in full and final settlement of all of his claims against Defendants, including any and all subrogation interests or liens, if any, arising out of the matters here in controversy. It is therefore:

**ORDERED** that Plaintiff's cause of action should be dismissed as to all Defendants with full prejudice to Plaintiff against the re-filing of the same and that Defendants be relieved from any and all further responsibility in this matter. It is further **ORDERED** that Plaintiff shall satisfy any and all present or future liens of any kind, known or unknown, which may relate to the settlement proceeds. Each party will bear its own costs and attorney's fees.

**ENTER:**

s/ Susan K. Lee

SUSAN K. LEE

UNITED STATES MAGISTRATE JUDGE

**AGREED TO AND APPROVED BY:**

THE RHODEN FIRM

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LLC; GGNSC Clinical Services, LLC; Golden  
Gate National Senior Care, LLC; GGNSC  
Administrative Services, LLC; Golden Gate  
Ancillary, LLC; GGNSC Holdings, LLC; and  
360 Healthcare Staffing, LLC*

**CERTIFICATE OF SERVICE**

I certify that on July 28, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.

By: /s/Amanda E. Kelley  
Amanda E. Kelley